

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

KAREN LURIE,

Plaintiff,

v.

**GLOBE LIFE AND ACCIDENT
INSURANCE COMPANY, et al.**

Defendants.

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Case No. 1:06-cv-0034MEF

DEFENDANT'S DEPOSITION DESIGNATIONS

Defendant and Defendant's counsel state unto the Court that they do not expect to introduce any excerpts of any depositions at the trial of this cause, except for impeachment purposes. Based upon conversations with counsel for Plaintiff, Plaintiff and her attorney, William Matthews, are expected to appear at trial to provide testimony. Defense counsel also believes that all three of its employees who have given depositions will appear live at trial. Defense counsel has been informed by Globe however, that there is an outside possibility that Ms. Barbara Hernandez of Globe Life may be unable to travel from Globe Life's headquarters in Oklahoma to Alabama due to a current health condition. If the outside possibility of Ms. Hernandez being unable to appear at trial to provide testimony is realized, or if the Plaintiff or Mr. Matthews are not available for some reason, Defendant reserves the right to read their depositions into evidence at that time in its entirety. The depositions of Ms. Hernandez and Plaintiff have already been provided to the Court as exhibits to Globe's summary judgment motion and are incorporated herein by reference. The deposition of William Matthews is attached hereto as Exhibit "A."

/s/Bobby Poundstone
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CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

William B. Matthews, Jr., Esq.
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